UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

FSIS NOTICE

43-06 | 7/20/06

RETAIL *ESCHERICHIA COLI* (*E. coli*) O157:H7 SAMPLING

This notice provides direction to Investigators from the Office of Program Evaluation, Enforcement, and Review (OPEER), Compliance and Investigations Division (CID), for collecting raw ground beef samples at retail stores for *Escherichia coli* (*E. coli*) O157:H7 analysis. The notice provides clarification as to when at retail facilities investigators should or should not collect ground beef samples. This notice also provides clarification as to what products are considered "specially manufactured beef trimmings."

I. Collecting Samples of Raw Ground Beef Product at Retail Facilities

A. Investigators are to continue to follow the directions in FSIS Directive 10,010.1, Revision 1, for collecting a sample of raw ground beef product at retail facilities and continue to use the Retail Ground Beef Sampling Worksheet when a ground beef or veal product sample is collected for *E. coli* O157:H7 analysis. Investigators should collect a sample at the beginning of the time the product is made available to the customers. Investigators are to collect samples during a retail review when they determine that the retail facility:

1. does not maintain records of the federal or state establishment numbers of its suppliers;

2. has no grinding records;

3. grinds whole muscles;

4. has grinding records that show that the potential exists for cross-contamination to occur. This may be the case if:

   a. the store mixes irradiated and un-irradiated beef,

   b. the records are unclear as to whether only in-house trim is used, or

   c. the records are unclear as to whether meat cuts (e.g., steaks, chops) for ground beef are used before their sell-by date; or

5. is grinding or holding the product under insanitary conditions.

II. Reasons Not To Collect Samples of Raw Ground Beef for *E. coli O157:H7* Analysis

A. An investigator is not to take a raw ground beef sample for an *E. coli* O157:H7 analysis when:

1. the product is case ready (i.e., fully labeled consumer sized packages of ground beef from an official establishment);

2. the product is repackaged product (i.e., product that the retail facility does not grind and only portions such product into retail trays);

3. the retail facility only regrinds product previously ground at official establishments and does not conduct any practices that could introduce *E. coli* O157:H7 into the product;

4. the firm does not produce ground beef products; and

5. The product is accompanied by documentation to the retail store that the product is "specially handled beef manufacturing trimmings," and that the retail facility should control the product to prevent contamination with *E. coli* O157:H7.

NOTE: Specially handled beef manufacturing trimmings generally are sub-primals that have undergone an antimicrobial treatment for *E. coli* O157:H7 as part of a HACCP plan, are trimmed to meet a specific lean-to-fat ratio, are cut into slices, are sampled for *E. coli* O157:H7 through the establishment's verification testing program, and are sealed in bags for direct sale to a retail facility. As part of the design of its HACCP plan, the official establishment addresses the intended users of the specially handled beef manufacturing trimmings (i.e., the retail facilities) and maintains a mechanism for informing the retail facility about the need to control the product to prevent contamination with *E. coli* O157:H7.

NOTE: Investigators are to record in the Daily Activity Report (DAR) System whether they did or did not collect a sample (see Attachment 1).

Contact the Technical Service Center at 1-800-233-3935 for technical questions.

Assistant Administrator
Office of Policy, Program, and Employee Development

Attachment 1

Recording Information in the Daily Activity Report System

At each retail review, the Investigator marks a reason code for either taking or not taking a sample.

1. Reasons a sample is taken for analysis for *E. coli* O157:H7 listed in the "Taken" drop down box include:

01__No grinding records or insufficient grinding records available
02__Records do not indicate whether trim was used
03__Firm grinds trim
04__Firm grinds whole muscle (e.g., chuck) or records do not indicate inclusion of close or outdated sell by dates of meat cuts (e.g., steaks, chops, etc.)
05__Firm mixes irradiated and un-irradiated beef
06__Other, please type explanation in NOTES box

2. Reasons a sample is not taken for analysis for *E. coli* O157:H7 listed in the "Not Taken" drop down box include:

21__Case Ready Product
22__Repackaged Product
23__Regrinds Federal or State Coarse Ground Product (e.g., coarse ground product produced at Federal or State plant is reground at retailer)
24__Firm does not produce ground beef product(s)
25__Other, please type explanation in NOTES box

3. If an Investigator does not check one of the reasons in 1. or 2. above then provide an explanation under the "Other" reason code of either 06 or 25.